

# EXHIBIT

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>3 KAREN BACKUES KEIL, ) 4 Plaintiff, ) 5 V. ) Case No. 6 ) 5:18-CV-06074-BP 7 ) 8 MHM SERVICES, INC., a ) 9 Virginia Corporation, ) 10 JOHN DUNN, and EDWARD BEARDEN, ) 11 ) 12 Defendants. )</p> <p>13 IN THE UNITED STATES DISTRICT COURT 14 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>15 LYNNSEY BETZ, ) 16 Plaintiff, ) 17 V. ) Case No. 18 ) 5:18-CV-06079-FJG 19 ) 20 EDWARD BEARDEN, et al., ) 21 ) 22 Defendants. )</p> <p>23 IN THE UNITED STATES DISTRICT COURT 24 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>25 ASHLEY ZIESER, ) Plaintiff, ) V. ) Case No. 5:18-CV-06103-FJG EDWARD BEARDEN, et al., ) Defendants. )</p>	<p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 Page</p> <p>4 Questions by Mr. Ammann.....8</p> <p>5 Questions by Mr. Buchheit.....79</p> <p>6 INDEX OF EXHIBITS</p> <p>7 DEPOSITION EXHIBITS</p> <p>8 No exhibits proffered.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>3 TERI DEAN, ) 4 Plaintiff, ) 5 V. ) Case No. 6 ) 5:19-CV-06022-SRB 7 ) 8 EDWARD BEARDEN, et al., ) 9 ) 10 Defendants. )</p> <p>11 IN THE UNITED STATES DISTRICT COURT 12 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>13 JANE DOE, ) 14 Plaintiff, ) 15 V. ) Case No. 16 ) 19-cv-6161-BP 17 ) 18 EDWARD BEARDEN, ) 19 In his Individual Capacity, ) 20 ) 21 Defendant. )</p> <p>22 VIDEOTAPED DISCOVERY DEPOSITION OF ELIJAH MOSIER 23 Taken on behalf of Plaintiffs</p> <p>24 The deposition of ELIJAH MOSIER, a 25 witness called at the instance of the Plaintiffs, for purposes of DISCOVERY taken on April 7, 2021, at 9:00 a.m., via Zoom, before Erika Schuster, Illinois Certified Shorthand Reporter No. 084-004660, pursuant to notice.</p>	<p>1 APPEARANCES</p> <p>2</p> <p>3 JENNIFER SNOW JOHN J. AMMANN BRENDAN ROEDIGER Saint Louis University Legal Clinic 100 North Tucker, Suite 704 St. Louis, MO 63101 314-977-2778</p> <p>4</p> <p>5 On Behalf of the Plaintiffs,</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 NICOLAS TAULBEE Office of the Attorney General 615 East 13th Street Suite 401 Kansas City, MO 64106 816-889-5000</p> <p>11</p> <p>12</p> <p>13</p> <p>14 ZACHARY BUCHHEIT CHRISTAL WANG Office of the Attorney General 207 West High Street Jefferson City, MO 65101 573-751-3321</p> <p>15</p> <p>16</p> <p>17</p> <p>18 On Behalf of the Defendants.</p> <p>19 VIDEOGRAPHER: JOHN NIEHAUS</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 A. Well, I have CIT training with DOC  
2 and then harassment training certificates. Oh, I  
3 can't remember a lot of them.  
4 Q. And the harassment training  
5 certificates, how often would you get trained on  
6 harassment?  
7 A. I think it was like a – we do it  
8 once a year.  
9 Q. And that's been since you started  
10 working with the DOC?  
11 A. Yes.  
12 Q. And what year did you start working  
13 for the DOC?  
14 A. June of 2008.  
15 Q. And you're still currently employed  
16 with the DOC, true?  
17 A. Yes, ma'am.  
18 Q. Can you walk me through between June  
19 of 2008 and currently both your job titles and  
20 the location that you worked at with the DOC?  
21 A. So you are asking for – to break it  
22 down from CO1, CO2 and CO3?  
23 Q. Yes. And the facility – I guess to  
24 short circuit that, you're no longer at  
25 Chillicothe right now, correct?

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1 A. No, ma'am.  
2 Q. But obviously you were a few years  
3 ago, true?  
4 A. Yes, ma'am.  
5 Q. In addition to telling me when you  
6 were a CO1, a CO2, I want to know where you were  
7 working at too between June of 2008 and today, if  
8 you can?  
9 A. Yes. I was a CO1 in 2008 at  
10 Chillicothe all the way up to May of 2015 I  
11 promoted to sergeant at Chillicothe and then I  
12 just recently got promoted to lieutenant at  
13 Western Missouri Correctional Center in January  
14 of '21.  
15 Q. And when did you – you were sergeant  
16 in 2015 in Chillicothe as well, right?  
17 A. Yes. A sergeant, yes.  
18 Q. And when did you get transferred to  
19 Western Missouri Correctional Center?  
20 A. I did an interview, and that would be  
21 January the 18th of 2021.  
22 Q. So between June of 2008 and January  
23 of 2021 you were working for the DOC at  
24 Chillicothe Correctional Center?  
25 A. Yes, ma'am.

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1 Q. Okay. And why did you, I guess,  
2 leave Chillicothe? What was the reasoning behind  
3 that?  
4 A. Because I got promoted.  
5 Q. Okay. There wasn't an opportunity to  
6 be promoted and stay at Chillicothe?  
7 A. Well, there was. I tried at  
8 Chillicothe, and I tried at Western to get  
9 promoted, and the one at Chillicothe they already  
10 filled, so I interviewed at Western and Western  
11 took me.  
12 Q. Got it. And now I want to know if  
13 you remember – and again, as I said earlier, if  
14 you don't, that's totally fine. Records speak  
15 for themselves, but between June of 2008 and May  
16 of 2015 when you were CO1 at Chillicothe, where  
17 were you assigned, either housing units or  
18 buildings?  
19 A. At seven house.  
20 Q. The whole time between 2008 and 2015?  
21 A. Well, I was at seven house and then  
22 when I made sergeant, I went to ad seg.  
23 Q. And is that – is that the same as  
24 one house?  
25 A. Yes, ma'am.

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1 Q. And so in 2000 – so I just want to  
2 make sure I understand your testimony correctly.  
3 Between 2008 and 2015, you were assigned to seven  
4 house?  
5 A. Yes.  
6 Q. Were you ever filling in at other  
7 houses, going to other houses?  
8 A. Yes, but I can't give you the dates  
9 or times.  
10 Q. That's fine. That's fine. And then  
11 in May of 2015, when you were promoted, you were  
12 assigned to one house?  
13 A. Yes, ma'am. I took a bid to one  
14 house.  
15 Q. Okay. And you stayed at one house  
16 between May of 2015 and January of 2021?  
17 A. No. No, ma'am. I was there probably  
18 maybe for two, two and a half years and then I  
19 took a bid on four house.  
20 Q. And did you stay on four house until  
21 you left earlier this year?  
22 A. No. I took a bid later on to six  
23 house, and that's where I stayed until I left  
24 this year.  
25 Q. Okay.

5 (Pages 17 to 20)